

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 23-11069 (CTG)  
)  
) (Jointly Administered)  
)  
)

**DEBTORS' WITNESS & EXHIBIT LIST  
FOR HEARING ON JUNE 17, 2025 AT 10:00 A.M. (ET)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit this witness and exhibit list in connection with the hearing scheduled for **June 17, 2025, at 10:00 a.m. (ET)**, before the Honorable Craig T. Goldblatt, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801 (the “Hearing”), at which time the following motion (the “Motion”) is currently scheduled to be heard:

1. *Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors’ Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code* [Docket No. 6204]

**WITNESSES**

The Debtors reserve the right to question any witness included on any other parties’ witness list.

The Debtors reserve the right to call any witness necessary to lay foundation or for rebuttal.

---

1 A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

**EXHIBITS**

The Debtors designate the following exhibits that may be used at the Hearing in connection with the Motion:

| <b>Debtors' Exhibit No.</b> | <b>Exhibit Description</b>   | <b>ECF No.</b> |
|-----------------------------|--|----------------|
| <b>1</b>                    | Third Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors, dated March 28, 2025  | 5995           |
| <b>2</b>                    | Third Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors, dated March 28, 2025 | 5996           |
| <b>3</b>                    | Objection of Debtors to Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code, dated May 5, 2025   | 6225           |
| <b>4</b>                    | Yellow Corp. MEPP Claims Summary<br>[YELLOW_DEBTORS_CONVERSION_00024940]   |                |
| <b>5</b>                    | Minutes of the Meeting of the Board of Directors of Yellow Corporation ("Yellow"), with attached "Presentation to Debtors Regarding Proposed Committee Settlement Plan," dated March 20, 2025 [YELLOW_DEBTORS_CONVERSION_00024877]   |                |
| <b>6</b>                    | Excel spreadsheet, "Chapter 11 Yellow – Recovery by Legal Entity (Mid / \$800M MEPP Claim Scenario with Base +\$770 Dist. Value)," dated March 21, 2025<br>[YELLOW_DEBTORS_CONVERSION_00024717]  |                |
| <b>7</b>                    | Minutes of the Meeting of the Board of Directors of Yellow Corporation ("Yellow"), with attached Presentation to the Board of Directors, dated March 23, 2025<br>[YELLOW_DEBTORS_CONVERSION_00024910]  |                |
| <b>8</b>                    | Yellow Corporation Board Meeting presentation, dated May 20, 2025 [YELLOW_DEBTORS_CONVERSION_00024921]   |                |

| <b>Debtors'<br/>Exhibit No.</b> | <b>Exhibit Description</b>   | <b>ECF No.</b> |
|---------------------------------|--|----------------|
| <b>9</b>                        | Excel spreadsheet, “Yellow – Remaining Properties by Sale Status,” dated May 25, 2025<br>[YELLOW_DEBTORS_CONVERSION_00024718]                          |                |
| <b>10</b>                       | Debtors’ Responses and Objections to MFN Partners, LP and Mobile Street Holdings, LLC First Set of Interrogatories, dated June 2, 2025                 |                |
| <b>11</b>                       | 30(b)(6) Deposition Transcript of Brian Whittman, dated June 4, 2025   |                |
| <b>12</b>                       | 30(b)(6) Deposition Transcript of Matthew Doheny, dated June 5, 2025   |                |
| <b>13</b>                       | MFN Parties’ Responses and Objections to Debtors’ First Set of Interrogatories to MFN Partners, LP and Mobile Street Holdings, LLC, dated June 9, 2025 |                |
| <b>14</b>                       | 30(b)(6) Deposition Transcript of Meredith Lahaie, dated June 11, 2025   |                |
| <b>15</b>                       | 30(b)(6) Deposition Transcript of Brad Berliner, dated June 12, 2025 <b>(final transcript forthcoming)</b>   |                |
| <b>16</b>                       | 30(b)(6) Deposition Transcript of Zach Sperling, dated June 12, 2025 <b>(final transcript forthcoming)</b>   |                |

The Debtors reserve the right to use any exhibit listed by any other party. The Debtors also reserve the right to amend, shorten, or supplement this witness and exhibit list prior to the Hearing.

Dated: June 13, 2025  
Wilmington, Delaware

*/s/ Peter J. Keane*

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Peter J. Keane (DE Bar No. 5503)  
Edward Corma (DE Bar No. 6718)  
**PACHULSKI STANG ZIEHL & JONES LLP**  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19801  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: ljones@pszjlaw.com  
tcairns@pszjlaw.com  
pkeane@pszjlaw.com  
ecorma@pszjlaw.com

Patrick J. Nash Jr., P.C. (admitted *pro hac vice*)  
David Seligman, P.C. (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: patrick.nash@kirkland.com  
david.seligman@kirkland.com

-and-

Allyson B. Smith (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: allyson.smith@kirkland.com

*Co-Counsel for the Debtors and Debtors in Possession*